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February 14, 2022

BY: ECF

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Kaye v. NYC Health & Hospitals Corp. et al.*, 18-cv-12137 (JPC)(JLC)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants the New York City Health and Hospitals Corporation (“H+H”), Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel, in the above-referenced matter. Consistent with Section 3.B. of Your Honor’s Individual Rules and Practices in Civil Cases, I write to respectfully request a brief extension of time, from February 16, 2022 to March 4, 2022, to file defendants’ motion for summary judgment. This is defendants’ second and final request for an extension of time.

As an initial matter, I apologize for troubling the Court with this second extension request. Yet due to obligations in other matters, which includes the supervision of attorneys in this Office, and a pre-planned vacation during President’s Week with my family, additional time is necessary to fully complete both defendants’ Local 56.1 Statement and the accompanying Memorandum of Law. Defendants’ anticipate this to be the final extension request.

Defendants have reached out to plaintiff by both telephone and email, and have been unable to speak to plaintiff in order to secure her consent to this extension request.

Should the Court grant defendants’ extension request, Defendants propose the following briefing schedule:

- Defendants’ Motion for Summary Judgment due **March 4, 2022**;

- Plaintiff's Opposition due **April 18, 2022**;
- Defendants' Reply due on **May 2, 2022**.

Defendants thank the Court in advance for its consideration of this request.

Respectfully submitted,

ECF /s/

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cc: Special Hagan (by ECF)